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ATTORNEYS AND COUNSELORS AT LAW

ADMITTED TO THE UNITED STATES  
SUPREME COURT BAR (1996)

“A VETERAN OWNED LAW FIRM”

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February 8, 2020

**VIA, ELECTRONIC FILING**The Honorable Jocelyn Boyd,  
Chief Clerk/Executive Director,  
Public Service Commission of South Carolina

- Re:
- Docket 2019-224-E– South Carolina Energy Freedom Act (House Bill 3659)  
Proceeding Related to S.C. Code Ann. Section 58-37-40 and Integrated Resource  
Plans for Duke Energy Carolinas, LLC
  - Docket 2019-225-E – South Carolina Energy Freedom Act (House Bill 3659)  
Proceeding Related to S.C. Code Ann. Section 58-37-40 and Integrated Resource  
Plans for Duke Energy Progress, LLC
  - **Motion to File Direct Testimony/Exhibits Under Seal**

Ms. Boyd:

The undersigned represents the South Carolina Solar Business Alliance, Inc., (“SCSBA”). I filed “public” Direct Testimony/Exhibits for SCSBA’s Witness Kevin Lucas, on February 5, 2021.

Mr. Lucas also has a “Confidential” version of his Direct Testimony/Exhibits. The Confidential version of Mr. Lucas’ Direct Testimony/Exhibits was also provided to the Companies’ counsel on February 5, 2021.

Because Mr. Lucas’ Direct Testimony/Exhibits contained Confidential and/or proprietary information, provided to him by the Company, please consider this correspondence as a Motion to file the “Confidential” version of Mr. Lucas’ Direct Testimony/Exhibits, under seal. The Ground for this Motion is as stated hereinabove.

Finally, consistent with this Commission’s protocol, we are hand-delivering Confidential copies of Mr. Lucas’ Direct Testimony/Exhibits to the Commission today, appropriately marked.

Respectfully Submitted,

/s/Richard L. Whitt  
Richard L. Whitt,  
*As Counsel for the South Carolina Solar  
Business Alliance, Inc.*

RLW/cas

cc: All parties of record in Dockets 2019-224-E and 2019-225-E, *via electronic mail*